

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

VLADIMIR GUSINSKY REVOCABLE )  
TRUST, derivatively on behalf of )  
KARYOPHARM THERAPEUTICS, INC., )

Plaintiff,

v.

MICHAEL G. KAUFFMAN, SHARON )  
SHACHAM, JUSTIN A. RENZ, MICHAEL )  
F. FALVEY, GAREN G. BOHLIN, MIKAEL )  
DOLSTEN, BARRY E. GREENE, )  
MANSOOR RAZA MIRZA, DEEPIKA R. )  
PAKIANATHAN, J. SCOTT GARLAND, )  
and KENNETH E. WEG, )

Defendants,

and

KARYOPHARM THERAPEUTICS INC., )  
Nominal Defendant. )

C.A. No. 20-cv-12213-NMG

**JOINT MOTION TO STAY ACTION  
PENDING FURTHER  
PROCEEDINGS IN RELATED  
SECURITIES CLASS ACTION**

**JOINT MOTION TO STAY ACTION PENDING FURTHER PROCEEDINGS IN  
RELATED SECURITIES CLASS ACTION AND [PROPOSED] ORDER**

Plaintiff Vladimir Gusinsky Revocable Trust (“Plaintiff”), and Defendants Michael G. Kauffman, Sharon Shacham, Justin A. Renz, Michael F. Falvey, Garen G. Bohlin, Mikael Dolsten, Barry E. Greene, Mansoor Raza Mirza, Deepika R. Pakianathan, J. Scott Garland, Kenneth E. Weg, and Nominal Defendant Karyopharm Therapeutics Inc. (“Defendants”) (together “Parties”) hereby jointly move for an order staying this shareholder derivative action pending further proceedings in a related securities class action pending before this Court.

In support of this Motion, the Parties state as follows:

1. On September 17, 2019, a putative shareholder class action, styled as *In re Karyopharm Therapeutics Inc., Securities Litigation.*, Case No. 19-cv-11972-NMG, (“the Securities Class Action”) was filed in this Court;
2. On October 22, 2020, plaintiff in the Securities Class Action filed a Second Amended Complaint;
3. Defendants in the Securities Class Action moved to dismiss on November 2, 2020 and briefing on the Motion to Dismiss concluded on December 3, 2020;
4. The Motion to Dismiss the Securities Class Action is currently pending before this Court;
5. Pursuant to the PSLRA, all discovery and other proceedings in the Securities Class Action are statutorily stayed until and unless a motion to dismiss in that action has been denied in whole or in part;
6. On December 14, 2020, Plaintiff filed a Verified Shareholder Derivative Complaint in this Court (“Complaint”) (Dkt. No. 1);
7. This shareholder derivative action is based on allegations substantially similar to those in the Securities Class Action;
8. The interests of efficiency and economy would be furthered by staying proceedings in this action until it is determined by the Court whether the related Securities Class Action can survive the pending motion to dismiss, and that litigating this action in the meantime would require the Parties and the Court to incur potentially unnecessary time and expense.

NOW, THEREFORE, the parties jointly move the Court for entry of the accompanying order providing that:

1. All proceedings and deadlines in this action, including all deadlines for responding to the Complaint, shall be stayed;
2. The stay of proceedings shall remain in effect until the earlier of (i) an order denying the motion to dismiss, in whole or in part, in the Securities Class Action, or (ii) dismissal of the Securities Class Action with prejudice;
3. While this action is stayed, Defendants shall promptly notify Plaintiff, through its undersigned counsel, of the filing of any derivative action(s) based on the same or similar facts as those alleged in this action;
4. Upon termination of the stay pursuant to the provisions of paragraph 2, the parties shall meet and confer within twenty-one (21) days regarding: (i) an agreed-upon deadline, if necessary, for Defendants to move, answer or otherwise respond to the operative complaint in this action; and (ii) a briefing schedule for any motion to dismiss the operative complaint; and
5. By asking the Court to enter this stay, the parties do not waive any rights not specifically addressed herein, including Defendants' right to challenge the sufficiency of Plaintiff's Complaint on demand futility or other grounds, the right to pursue formal discovery after the stay is lifted, the right to object to any formal discovery, the right to move for a future stay, and the right to file any other motion that any party deems appropriate.

Dated: January 7, 2021

/s/ Joseph P. Calandrelli

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*Counsel for Plaintiff*

Dated: January 7, 2021

/s/ Michael G. Bongiorno

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